

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IMPLICIT, LLC,)	
)	
Plaintiff,)	Case No. 2:19-cv-00040-JRG-RSP
)	LEAD CASE
v.)	
)	Case No. 2:19-cv-00042-JRG-RSP
SOPHOS LTD.)	MEMBER CASE
)	
)	
Defendant.)	

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Implicit, LLC (“Plaintiff”) and Defendant Sophos Ltd. (“Sophos”), pursuant to this Court’s June 3, 2014 Standing Order Regarding Proper Notification of Settlement to the Court, hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement between Plaintiff and Sophos.

All matters in controversy between the parties have been settled, and Plaintiff and Sophos have reached an agreement and are in the process of obtaining signatures. The settlement provides that certain terms will be performed, and then the claims between Plaintiff and Sophos will be dismissed. The parties wish to conclude the settlement without burdening the Court with any additional filings and without incurring unnecessary expense. The parties anticipate that they will be able to submit dismissal papers within thirty (30) days from the date of this filing. Accordingly, the parties respectfully request that the Court grant a stay of all proceedings between Plaintiff and Sophos, including all pending deadlines between the parties, until October 11, 2019.

The parties submit that good cause exists for granting this agreed motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served.

Wherefore, the parties respectfully requests that the Court enter the proposed order submitted with this joint motion as set forth above, and grant the parties such other and further relief to which they are entitled.

Dated: September 11, 2019

Respectfully submitted,

/s/ Jennifer P. Ainsworth

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(with permission by Jennifer P. Ainsworth)

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3), on this the 11th day of September, 2019.

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth

CERTIFICATE OF CONFERENCE

This is to certify that counsel have conferred concerning this Joint Motion and this Joint Motion sets out the Parties' positions.

/s/ Jennifer P. Ainsworth
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